NORTH CAROLINA DIVISION OF AIR QUALITY

Application Review

Issue Date: xx/xx/2019

Region: Winston-Salem Regional Office
County: Guilford
NC Facility ID: 4101086
Inspector's Name: Robert Barker
Date of Last Inspection: 02/21/2019
Compliance Code: 3 / Compliance - inspection

Facility Data

Applicant (Facility's Name): City of Greensboro - White Street Landfill

Facility Address:
City of Greensboro - White Street Landfill
2503 White Street
Greensboro, NC 27405

SIC: 4953 / Refuse Systems
NAICS: 562212 / Solid Waste Landfill

Facility Classification: Before: Title V **After:** Title V
Fee Classification: Before: Title V **After:** Title V

Permit Applicability (this application only)

SIP: 15A NCAC 02D .0516, .0521, .0524, .1111, .1806
NSPS: Subpart WWW
NESHAP: Subparts AAAA and CCCCCC
PSD: N/A
PSD Avoidance: N/A
NC Toxics: N/A
112(r): N/A
Other: N/A

Contact Data

Facility Contact	Authorized Contact	Technical Contact
Lewis Walker Landfill Compliance Coordinator (336) 373-7662 2503 White Street Greensboro, NC 27405	D. Dale Wyrick Director of Field Operations (336) 373-2783 401 Patton Avenue Greensboro, NC 27406	Lewis Walker Landfill Compliance Coordinator (336) 373-7662 2503 White Street Greensboro, NC 27405

Application Data

Application Number: 4101086.19A
Date Received: 03/25/2019
Application Type: Renewal
Application Schedule: TV-Renewal

Existing Permit Data
Existing Permit Number: 08830/T08
Existing Permit Issue Date: 01/05/2015
Existing Permit Expiration Date: 12/31/2019

Total Actual emissions in TONS/YEAR:

CY	SO2	NOX	VOC	CO	PM10	Total HAP	Largest HAP
2017	1.33	12.87	4.19	58.69	3.38	2.62	1.46 [Hydrogen chloride (hydrochlori]
2016	1.84	17.81	4.33	81.19	4.54	3.22	2.02 [Hydrogen chloride (hydrochlori]
2015	1.47	14.23	4.42	77.45	3.74	2.85	1.62 [Hydrogen chloride (hydrochlori]
2014	1.25	12.11	4.55	65.89	3.32	2.65	1.37 [Hydrogen chloride (hydrochlori]
2013	1.25	12.02	4.48	65.40	2.95	2.70	1.38 [Hydrogen chloride (hydrochlori]

Review Engineer: Joshua L. Harris

Review Engineer's Signature: **Date:**

Comments / Recommendations:
Issue 08830/T09
Permit Issue Date: xx/xx/2019
Permit Expiration Date: xx/xx/2024

1. Purpose of Application

The City of Greensboro – White Street Landfill is an active Municipal Solid Waste (MSW) landfill located in Greensboro, Guilford County. The landfill is requesting renewal of their current Title V permit without changes. Application No. 4101086.19A was timely submitted and was received by DAQ on March 25, 2019. The application will go through the 30-day public notice, and 45-day EPA review periods prior to issuance.

The facility contact for this application is Lewis Walker, Landfill Compliance Coordinator, (336-373-7662). A consultant, SCS Engineers P.C., was used to prepare the application. The contact at SCS Engineers is David Greene, Project Manager, (828-285-8951).

2. Facility Description

The City of Greensboro – White Street Landfill is an active MSW landfill consisting of three units: Phase I which is an unlined unit that closed in 1978, Phase II (ID No. ES-2) which is an unlined unit that closed in 1998, and Phase III which is a Subtitle-D lined unit. Phase III ceased accepting MSW in 2006. The landfill still accepts yard waste and C&D waste, which are placed on top of the closed Phase II unit, and also accepts sewage sludge and incineration ash, which are placed in Phase III. MSW is currently processed through the City of Greensboro Transfer Station, and MSW will only be sent to the White Street Landfill in the event that the transfer station is unable to be used and other disposal options have been exhausted.

The landfill has a design capacity greater than 2.5 million Mg and 2.5 million m^3, and also has demonstrated that NMOC emissions exceed 50 Mg/yr. As such the landfill is subject to NSPS Subpart WWW, and MACT Subpart AAAA, and is required to operate a gas collection and control system (GCCS). The collected landfill gas (LFG) is routed to two LFG-fired flares (ID Nos. CD-1 and CD-3). CD-1 serves to control the gas generated by the non-active landfill Phases I and II, and CD-3 serves to control the gas generated by the active Phase III landfill. The landfill has also operated a treatment system (ID No. CD-Treatment) in the past, and routed treated LFG off-site to Cone Mills (Facility ID 0100162), however Cone Mills has permanently closed so all of the generated gas is flared in CD-1 and CD-3. The landfill has not requested to remove the treatment system as a permitted control device.

3. Application Chronology

03/25/19 The Division of Air Quality (DAQ), Winston-Salem Regional Office (WSRO), received the permit renewal application, Application No. 4101086.19A, and forwarded two copies to the Raleigh Central Office (RCO). The application contained the required forms, and there was no request for confidentiality.

03/28/19 RCO received two copies of the permit renewal application.

03/29/19 RCO sent the facility a letter acknowledging receipt of the complete permit application.

04/03/19 Robert Barker, WSRO, provided comments on the permit application.

07/17/19 Joshua Harris sent electronic copies of the draft permit and review documents to Booker Pullen, Samir Parekh, Davis Murphy and Robert Barker for comments.

07/19/19 Booker Pullen responded with minor comments and a recommendation that a table be inserted into Section 9 to show the results of previous modeling for toxic air pollutants; that table has been added.

07/22/19 Robert Barker responded with minor editorial comments.

07/23/19 Samir Parekh responded with no comments.

07/23/19 Joshua Harris sent electronic copies of the draft permit and review documents to D. Dale Wyrick, Lewis Walker, and David Greene for comments.

08/21/19 Joshua Harris received an email from David Greene stating that there were no comments on the draft documents.

Xx/xx/19 Public notice period ends; [comments received].

Xx/xx/19 EPA review period ends; [comments received].

Xx/xx/19 Air Quality Permit Revision No. 08830T09 issued.

4. Table of Changes to Existing Permit No. 08830T08

Existing Page(s)	New Page(s)	Section	Description of Changes
Cover and Throughout	Cover and Throughout	--	• Updated letterhead. • Updated the address of the Responsible Official. • Updated all dates and permit revision numbers.
Cover	Cover	--	Updated PSD tracking statement.
Attachment to Cover	Attachment to Cover	--	• Added label to IES-8 for applicability of 40 CFR 63, Subpart CCCCCC. • Updated URL for DAQ MACT/GACT guide.
1	1	--	Updated the address of the Winston-Salem Regional Office.
3	3	Emission Source Table	• Removed redundant control device ID Nos. listed in the "Control Device Description" column.
3	4	Summary Table	• Reorganized table in order of regulation number. • Included specific requirements for control of NMOC emissions.
10	4	2.1 A.1.	Moved the sulfur dioxide emissions from combustion sources section (15A NCAC 02D .0516).
10-11	5	2.1 A.2.	Moved the control of visible emissions section (15A NCAC 02D .0521).
4-10	5-11	2.1 A.3.	Referenced to the requirements in the permit instead of referring to the federal codes throughout this condition.
--	5-6	2.1 A.3.b-e.	Inserted the "Standards for Air Emissions from Municipal Solid Waste Landfills" section.
--	7	2.1 A.3.g.i.	Inserted actual equation required to calculate NMOC emissions.
5	--	--	Removed the conditions specific to the first 180 days after gas collection system startup.
--	7	2.1 A.3.g.v.	Added a reporting condition when the facility chooses to operate at a higher operation value at specific wells.
4	9	2.1 A.3.l.	• Moved the testing conditions to be after the compliance provisions. • Added noncompliance language.
9	--	--	Removed well closure section since it is covered under section 2.1 A.3.f.ii.(C).
9	--	--	Removed the initial annual report and the initial performance test conditions.
10	9	2.1. A.3.o.	Moved site-specific requirements.
--	11	2.1 A.3.x.	Added the landfill closure reporting requirement.
--	11	2.1 A.3.y.	Added the reporting requirement prior to removing of control equipment.
--	12	2.1 A.4.b and c	Added the operation/emission standards and the SSM provision.
11	12	2.1.A.4.d.	Added the noncompliance language.
--	12	2.1.A.4.e.	Added section to include language for deviations, consistent with 40 CFR 63.1965.
--	12-13	2.1.A.4.f.	Added section to include language for the startup, shutdown and malfunction plan, consistent with 40 CFR 63.6(e)(iii).
11	13	2.1.A.4.h. through j.	Updated the recordkeeping and reporting language to be consistent with 40 CFR 63.6(c)(iii), 63.6(c)(iv) and 63.6(c)(v).
12-21	14-23	3	Updated the General Conditions to latest version (Version 5.3).

5. Changes in Equipment

There are no changes being made to the facility's emission sources, control devices, or insignificant/exempt activities.

The facility's permitted emission sources are as follows:

Emission Source ID No.	Emission Source Description	Control Device ID No.	Control Device Description
ES-1 NSPS WWW MACT AAAA	Non-active (unlined) portion of landfill	GCCS-1	One landfill gas collection and control system
		CD-1	One candle stick-type flare (2800 scfm design flow rate)
ES-2 NSPS WWW MACT AAAA	Non-active (unlined) portion of landfill	CD-Treatment	Landfill gas treatment system (filtration, compression, and dewatering via refrigeration)
ES-3 NSPS WWW MACT AAAA	Active portion of landfill (lined)	GCCS-2	One landfill gas collection and control system
		CD-3	One candle stick-type flare (1500 scfm design flow rate)
		CD-Treatment	Landfill gas treatment system (filtration, compression, and dewatering via refrigeration)

The facility's insignificant/exempt activities are as follows:

Emission Source ID No.	Emission Source Description
IES-5	Leachate management system
IES-7	One 20,000 gallon Diesel fuel underground storage tank
IES-8 GACT CCCCCC	One 10,000 gallon unleaded gasoline underground storage tank
IES-8E	Diesel fuel-fired wood grinder (portable non road engine, 1050 hp)

6. Regulatory Review

The facility is subject to the following air quality regulations in addition to the General Conditions:

- 15A NCAC 02D .0516: Sulfur Dioxide Emissions from Combustion Sources
- 15A NCAC 02D .0521: Control of Visible Emissions
- 15A NCAC 02D .0524: New Source Performance Standards, 40 CFR 60, Subpart WWW
- 15A NCAC 02D .1111: Maximum Achievable Control Technology, 40 CFR 63, Subpart AAAA
- 15A NCAC 02D .1806: Control and Prohibition of Odorous Emissions

There are no regulatory changes for the landfill sources since the last time the permit was sent to Public notice and EPA review, therefore a full review is not required for the regulations listed above. The permit conditions have been updated to include the latest permitting language. NSPS WWW and MACT AAAA conditions were expanded to include the specific requirements in place of references to the federal regulation.

7. NSPS, NESHAP, PSD, 112(r), CAM & Attainment Status

- **NSPS** –

  - ✓ The MSW landfills (ID Nos. ES-1, ES-2, and ES-3) are subject to 40 CFR 60, Subpart WWW "Municipal Solid Waste Landfills" since the facility was modified after May 30, 1991. The landfill's design capacity is greater than 2.5 million Mg and 2.5 million m^3, and has an annual NMOC emission rate greater than 50 Mg/yr. Therefore, the landfill is subject to the GCCS requirements of NSPS Subpart WWW.

  - ✓ The MSW landfills (ID Nos. ES-1, ES-2, and ES-3) are NOT subject to 40 CFR 60, Subpart XXX "Municipal Solid Waste Landfills the Commenced Construction, Reconstruction, or Modification After July 17, 2014" since the facility has not been modified after July 17, 2014.

  - ✓ The diesel-fired wood grinder (ID No. IES-8E) is NOT subject to 40 CFR 60, Subpart IIII "Stationary Compression Ignition Internal Combustion Engines" because it is not a stationary source.

- **NESHAP** –

  - ✓ The diesel-fired wood grinder (ID No. IES-8E) is NOT subject to 40 CFR 63, Subpart ZZZZ "Reciprocating Internal Combustion Engines" because it is not a stationary source.

  - ✓ The MSW landfills (ID Nos. ES-1, ES-2, and ES-3) are subject to 40 CFR 63, Subpart AAAA "Municipal Solid Waste Landfills" since the facility has accepted waste since November 8, 1987, has a design capacity greater than 2.5 million Mg and 2.5 million m^3, and has had an annual NMOC emission rate greater than 50 Mg/yr.

- ✓ The gasoline storage tank (ID No. IES-8) is subject to 40 CFR 63, Subpart CCCCCC "Gasoline Dispensing Facilities" since the facility is an area source of HAPs, and the facility meets the definition of a gasoline dispensing facility as any stationary facility which dispenses gasoline into the tank of a motor vehicle, motor vehicle engine, nonroad vehicle, or nonroad engine, including a nonroad vehicle or nonroad engine used solely for competition. Gasoline storage tanks are listed as affected sources under §63.11111(a), and there are no size distinctions.

  Since IES-8 is an insignificant activity, there is no permit condition, however the facility is still required to comply with Subpart CCCCCC. The facility has the general duty to minimize emissions by operating and maintaining affected sources, and their associated air pollution control and monitoring equipment, in a manner consistent with safety and good air pollution practices for minimizing emissions. In addition, since the facility's throughput is expected to be less than 10,000 gallons per month based on throughput reported on the facility's annual AQEI, the facility is subject to the requirements of §63.11116. This section states that the facility must handle the gasoline in a manner which will not result in vapor release to the atmosphere for an extended period of time. Measures to be taken include, but are not limited to:

  - Minimize gasoline spills;
  - Clean up spills as expeditiously as practicable;
  - Cover all open gasoline containers and all gasoline storage tank fill-pipes with a gasketed seal when not in use; and
  - Minimize gasoline sent to open waste collection systems that collect and transport gasoline to reclamation and recycling devices.

  There are no notification or reporting requirements for facilities with a throughput of less than 10,000 gallons per month, however, the facility shall supply records of gasoline throughput within 24 hours of a request by DAQ. Additionally, should the facility's monthly gasoline throughput exceed 10,000 gallons, the facility will be subject to the requirements of §63.11117 for facilities with a monthly throughput of 10,000 gallons of gasoline or more, or §63.11118 for facilities with a monthly throughput of 100,000 gallons of gasoline or more, whichever is applicable, and must meet the applicable notification, testing, monitoring, recordkeeping, and reporting requirements. If an affected source's throughput ever exceeds an applicable throughput threshold, the affected source will remain subject to the requirements for sources above the threshold, even if the affected source throughput later falls below the applicable source threshold. [§63.11111(i)]

- **PSD –** PSD is not impacted by this application.

  - ✓ Guilford County has triggered increment tracking under PSD for PM_{10} and SO_2. This permitting action is neither expected to consume nor expand any increments.

- **112(r) –** The facility does not store any of the listed 112(r) chemicals in amounts that exceed the threshold quantities. Therefore, the facility is not required to maintain a written Risk Management Plan (RMP).

- **CAM –** CAM does not apply since this source is regulated by both NSPS and MACT regulations that were promulgated after 1990 and control the pollutants that would be subject to CAM.

- **Attainment status** – Guilford County is in attainment for all criteria pollutants.

8. Other Regulatory Requirements

- A Zoning Consistency Determination is NOT required for this permit application.

- A P.E. Seal is NOT required for this permit application.

- There are no permit application fees required for this permit application.

9. Emissions Review

Pollutant	Potential After Controls / Limitations* tons/yr	Potential Before Controls / Limitations tons/yr
PM (TSP)	9.61	0
PM_{10}	9.61	0
$PM_{2.5}$	9.61	0
SO_2	17.00	0
NOx	38.88	0
CO	211.57	0
VOC	3.94	22.79

*Calculations assume that the flares are operating at their maximum flow rates.

The facility's historic actual emissions can be seen in the table on page one of this document.

MSW Landfill Emissions:
Landfill volume emissions were calculated using the methane generation rate of 12,664,833 m^3/yr as calculated using LandGEM, and pollutant concentrations from AP-42 Chapter 2.4, November 1998. VOC emissions are 39% of NMOC. Post collection and control potential emissions were calculated by applying a collection efficiency of 85% and a destruction efficiency of 98%.

Example:

- CY2024 LFG generation rate from LandGEM = 25,329,666 m^3/year (or 2,891.5 m^3/hour)
- Methane is 50% of this gas stream (1,445.75 m^3/hour)
- Q_{NMOC} = Emission rate of NMOCs, m^3/hour
- C_{NMOC} = Concentration of NMOCs (595 ppmv, AP-42 default)
- Multiplication factor for 50% methane concentration in landfill gas = 2.0
- Molecular weight of NMOC (as n-hexane) = 86.18 g/gmol

$$Q_{NMOC} = 2.0 \times Q_{CH_4} \times \left(\frac{C_{NMOC}}{1\times10^6}\right) \text{ (AP-42, Equation 3)}$$

$$Q_{NMOC} = 2.0 \times 1{,}445.75 \frac{m^3}{hour} \times \left(\frac{595 \text{ parts}}{1\times10^6}\right) = 1.72 \frac{m^3}{hour}$$

The uncontrolled mass emissions of NMOC (UM_{NMOC}) was found using Equation 4 of AP-42, Section 2.4.4.2.

$$UM_{NMOC} = 1.72 \frac{m^3}{hour} \times \left[\frac{86.18 \text{ g/gmol} \times 1 \text{ atm}}{8.205 \times 10^{-5} \frac{m^3 - atm}{gmol - K} \times 1000 \frac{g}{kg} \times (273 + 25℃) \text{ K}} \right] \times 2.2 \frac{lb}{kg}$$

$$UM_{NMOC} = 13.34 \frac{\text{lb NMOC}}{hour} = 58.43 \frac{\text{tons NMOC}}{year}$$

To calculate the VOC component of the landfill's uncontrolled surface emissions, AP-42 states in note "c" of Table 2.4-2 that VOC emissions are 39 wt.% of the NMOC emissions, therefore:

$$UM_{VOC} = 0.39 \times 58.43 \frac{\text{tons NMOC}}{year} = 22.79 \frac{\text{tons VOC}}{year}$$

Volume emission of VOC from the landfill surface were calculated using AP-42 Section 2.4-6 Equation 5:

$$CM_P = \left[UM_P \times \left(1 - \frac{\eta_{col}}{100}\right)\right] + \left[UM_P \times \frac{\eta_{col}}{100} \times \left(1 - \frac{\eta_{cnt}}{100}\right)\right]$$

Where:
CM_p = Controlled mass emissions of pollutant
UM_p = Uncontrolled mass emission of pollutant
η_{col} = Collection efficiency of the landfill gas collection system, percent (85%)
η_{cnt} = Control efficiency of the landfill gas control flare (98%)

Only the first term is considered for emissions from the landfill surface, therefore:

$$CM_{VOC} = \left[22.79 \frac{tons}{year} \times \left(1 - \frac{85}{100}\right)\right] = 3.42 \frac{tons}{year}$$

Flare Emissions:
VOC emissions for the flares were calculated in similar fashion as above but are based on the maximum capacity of the flares, regardless of LFG generation rate from the landfill, and assume an 85% collection efficiency and 98% control efficiency.

Particulate, NOx, and CO emissions were calculated using the following emission factors:
NOx: 0.068 lb/mmBtu (AP-42 13.5-1)
CO: 0.37 lb/mmBtu (Manufacturer Value)
PM: 17 lb/10^6 ft^3 CH_4 (AP-42 2.4-5)

The flares are rated for a total heat input of 130.55 mmBtu/hr at 2,150 ft^3 CH_4 per minute (1,130 million ft^3 CH_4 per year), with a heat value of 506 Btu per cubic foot of landfill gas.

Examples:

$$\frac{130.55\ \text{mmBtu}}{\text{hour}} \times \frac{0.068\ \text{lb NOx}}{\text{mmBtu}} \times \frac{8{,}760\ \text{hours}}{\text{year}} \times \frac{1\ \text{ton}}{2000\ \text{lb}} = 38.88\ \frac{\text{tons NOx}}{\text{year}}$$

$$\frac{130.55\ \text{mmBtu}}{\text{hour}} \times \frac{0.37\ \text{lb CO}}{\text{mmBtu}} \times \frac{8{,}760\ \text{hours}}{\text{year}} \times \frac{1\ \text{ton}}{2000\ \text{lb}} = 211.57\ \frac{\text{tons CO}}{\text{year}}$$

$$\frac{1{,}130\ \text{million ft}^3\ \text{CH}_4}{\text{year}} \times \frac{17\ \text{lb PM}}{\text{million ft}^3\ \text{CH}_4} \times \frac{1\ \text{ton}}{2000\ \text{lb}} = 9.61\ \frac{\text{tons PM}}{\text{year}}$$

All particulate emissions from the combustion of landfill gas are considered as $PM_{2.5}$.

To calculate potential SO_2 emissions, AP-42 Chapter 2.4 was used along with information submitted by the facility in the application:

- Total flare design rating = 4,300 ft^3/minute (or 121.76 m^3/min = 7,305.7 m^3/hour)
- Methane is only 50% of this gas stream (3,652.85 m^3/hour)
- Q_S = Emission rate of reduced sulfur compounds, m^3/hour
- C_S = Concentration of reduced sulfur compounds (100 ppmv, as H_2S assumed by facility)
- Multiplication factor for 50% methane concentration in landfill gas = 2.0
- Molecular weight of H_2S = 34.08 g/mole
- Molecular weight of sulfur = 32.06 g/mole

$$Q_{H_2S} = 2.0 \times Q_{CH_4} \times \left(\frac{C_S}{1\times10^6}\right)$$ (AP-42, Equation 3)

$$Q_{H_2S} = 2.0 \times 3{,}652.85\ \frac{m^3}{\text{hour}} \times \left(\frac{100\ \text{parts}}{1\times10^6}\right) = 0.731\ \frac{m^3}{\text{hour}}$$

Conversion of H_2S flow rate to flow rate of sulfur only:

$$Q_S = Q_{H_2S} \times \frac{MW_S}{MW_{H_2S}} = 0.731\ \frac{m^3\ H_2S}{\text{hour}} \times \frac{32.06\ \text{g S/mole}}{34.08\ \text{g}\ H_2S\text{/mole}} = 0.687\ \frac{m^3\ S}{\text{hour}}$$

The mass of the pre-combustion sulfur present in the methane was found using Equation 4 of AP-42, Section 2.4.4.2.:

$$UM_s = 0.687\ \frac{m^3}{\text{hour}} \times \left[\frac{32.06\ \text{g/gmol} \times 1\ \text{atm}}{8.205 \times 10^{-5}\ \frac{m^3 - \text{atm}}{\text{gmol} - \text{K}} \times 1000\ \frac{\text{g}}{\text{kg}} \times (273 + 25°\text{C})\ \text{K}}\right] \times 2.2\ \frac{\text{pounds}}{\text{kg}}$$

$$UM_s = 1.98\ \frac{\text{pounds}}{\text{hour}}$$

To calculate SO_2 emitted from the combustion of sulfur, Equation 10 of Section 2.4-8 was used.

$$SO_2 \text{ emitted} = UM_s \times \frac{\eta_{col}}{100} \times 2.0$$

Where:
UM_{cl} = Uncontrolled mass emission rate of sulfur compounds (2.11 lb sulfur/hour)
η_{col} = Collection efficiency of the landfill gas collection system, percent (assumed 100% by facility)
2.0 = Ratio of the molecular weight of SO_2 to the molecular weight of Sulfur

$$SO_2 \text{ emitted} = 1.98 \frac{\text{lb}}{\text{hour}} \times \frac{100}{100} \times 2.0 \times 8760 \frac{\text{hours}}{\text{year}} \times \frac{1 \text{ ton}}{2000 \text{ lb}} = 17.34 \frac{\text{tons } SO_2}{\text{year}}$$

AP-42 does not account for the destruction efficiency of the flare, however, when the nominally assumed 98% control efficiency is accounted for, the hourly emission rate of SO_2 is 1.94 lb/hr or 17.00 tons per year.

10. Air Toxics

A toxics demonstration was made for the landfill in 2005, and the maximum impacts for the modeled pollutants did not exceed their respective AALs through 2009, the year during which the landfill's emission rates were projected to peak. Though it still can, the landfill has not received MSW since 2006, and the LFG generation rate has declined since that time per the submitted LandGEM projection. Therefore, this application results in no increases in toxic emissions beyond those previously evaluated, and no additional toxics modeling demonstration is required. Since the landfill is subject to MACT AAAA, it is exempt from permitting for toxics per 15A NCAC 02Q .0702(a)(27)(B). The permit contains neither a 2D .1100 nor a 2Q .0711 toxics condition.

The modeling conducted in 2005 resulted in the following impacts at the property boundary:

Pollutant	Averaging Period	% AAL
Acrylonitrile	Annual	21%
Benzene	Annual	12%
Hydrogen Sulfide	24-hour	<1%
Methyl Mercaptan	1-hour	<1%
Vinyl Chloride	Annual	11%

11. Statement of Compliance

The last compliance inspection at the landfill was conducted on February 22, 2019 by Robert Barker, WSRO DAQ. Mr. Barker found the landfill to be operating in apparent compliance with their air quality permit at that time.

The landfill has no negative compliance history for the last five years.

12. Public Notice Review

A notice of the DRAFT Title V Permit shall be made pursuant to 15A NCAC 02Q .0521. The notice will provide for a 30-day comment period, with an opportunity for a public hearing. Consistent with 15A NCAC 02Q .0525, the EPA will have a concurrent 45-day review period. Copies of the public notice shall be sent to persons on the Title V mailing list and EPA. Pursuant to 15A NCAC 02Q .0522, a copy of each permit application, each proposed permit and each final permit shall be provided to EPA.

The 30-day public notice period was from MONTH XX, 2019 through MONTH XX, 20XX.

The EPA 45-day review period was from MONTH XX, 2019 through MONTH XX, 20XX.

[Number of] comments were received during the public notice period and the EPA review period.

13. Comments and Recommendations

The permit renewal application for the City of Greensboro – White Street Landfill located in Greensboro, Guilford County, NC has been reviewed by DAQ to determine compliance with all procedures and requirements. DAQ has determined that this facility is complying or will achieve compliance, as specified in the permit, with all requirements that are applicable to the affected sources. The DAQ recommends the issuance of Air Permit No. 08830T09.